

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT CINCINNATI

MARY E. LENTZ,)	
)	
Plaintiff(s))	
)	
v.)	Cause No. C-1-01-599
)	
CINCINNATI INSURANCE)	
COMPANY, et al.)	
)	
Defendant(s))	

PLAINTIFF'S INITIAL DISCLOSURES

Comes now the Plaintiff pursuant to Federal Rule of Civil Procedure 26(a) hereby provides the following initial disclosures:

WITNESSES

1. Mark Huller, CIC Home Office
2. Dave Balzano, Former Managing Attorney for Dayton Office, now in Cincinnati
3. Fred Young, Former Managing Attorney for Dayton Office, currently at Utrecht & O'Neal in Dayton, OH.
4. Brian McHenry, Attorney at Dayton Office for CIC
5. Paula J. Ruppert, Former Support Staff at Dayton Office for CIC, currently at Eva Street, Dayton, OH, 937-253-0264
6. Julia Gibson, Former Support Staff at the Dayton Office for CIC
7. Sue Silberbusch, Former Attorney at the Dayton Office for CIC, currently in Orlando, FL

8. Donald Desseyn, Former Attorney at the Dayton Office for CIC, Address Unknown
9. Al Mathany, Member of the Special Investigative Unit of CIC
10. Greg Lewis, Senior Managing Attorney for CIC
11. Don Kaiser, Former Law Clerk for CIC, now in Dallas, TX
12. Shelly Harrison, Former Secretary at Dayton Office for CIC, Address Unknown
13. Ed Brueggeman, Former Attorney and Officer at CIC, Address Unknown
14. Mike Fitzpatrick, Former Managing Attorney at Dayton Office for CIC
15. Tim Timmell
16. James Benoski
17. Bruce Fisher

Initial disclosures are based on the information reasonably available and Plaintiff reserves the right to modify this disclosure as discovery continues. Each of these individuals will provide information regarding the allegations made in the complaint of Mary Lentz and will provide evidence of prior knowledge by Dave Balzano of using copy money for office pizza and lunches with approval and will also provide information about favored treatment to male employees who commit ethical violations or behave in an inappropriate professional manner in the office.

EXHIBITS

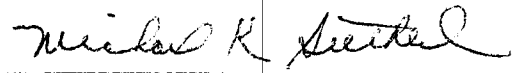
Plaintiff Mary Lentz believes that the following documents are available to support her claims raised in her complaint:

1. Receipts for purchases of food and beverage items for the office paid for with copy money;
2. Personnel file of Mary Lentz and any and all performance evaluations;
3. Performance evaluations of all associate counsel and managing attorneys for the Dayton office from 1996 through and including 2001;
4. Photocopies of checks or cancelled checks, letters and/or other correspondence demonstrating the reimbursement for copying costs of the cases managed by the Plaintiff, Mary Lentz, while an associate attorney at the Dayton office for CIC or Berlon & Timmel;
5. Any and all documents referring this matter to the local prosecutor in Dayton;
6. Any and all documents referring this matter to the disciplinary commission for the Dayton Bar Association (otherwise not protected by State Law or other provisions reasons of confidentiality); and
7. Any and all complaints or disciplinary actions brought against Berlon & Timmel by the Dayton Bar Association.

COMPUTATION OF DAMAGES

Plaintiff Mary Lentz believes that she has been damaged because of the wrongful termination based upon pretextual grounds and has suffered loss of income, and damage to her reputation. Lost income since her termination is approximately \$100,000.00. The damage to reputation and mental distress is \$500,000.00 (this is an initial estimate and Plaintiff reserves the right to modify these figures as discovery continues).

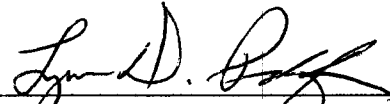
Respectfully Submitted,



Michael K. Sutherlin

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon Deborah S. Adams, Jack B. Harrison, FROST BROWN TODD LLC, 2200 PNC Center, 201 East Fifth Street, Cincinnati, Ohio 45201-5715 by first class, United States mail, postage prepaid, this 25th day of January, 2002.



Lynn Pundzak, Attorney For Plaintiff

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